

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

1201 NORTH MARKET STREET
P.O. BOX 1347
WILMINGTON, DELAWARE 19899-1347

(302) 658-9200
(302) 658-3989 FAX

JENNIFER YING
(302) 351-9243
(302) 225-2570 FAX
jying@morrisnichols.com

November 30, 2022

The Honorable Gregory B. Williams
J. Caleb Boggs Federal Building
844 N. King Street
Unit 26
Room 6124
Wilmington, DE 19801-3555

VIA ELECTRONIC FILING

Re: *CBV, Inc. v. ChanBond, LLC et al.*,
C.A. No. 21-1456 (GBW)

Dear Judge Williams:

We write on behalf of non-parties Atlantic Broadband Group, LLC; Bright House Networks, LLC; Cable One, Inc.; Cablevision Systems Corporation; CSC Holdings, LLC; Cequel Communications, LLC; Cequel Communications Holdings I, LLC d/b/a Suddenlink Communications; Charter Communications, Inc.; Comcast Corporation; Comcast Cable Communications, LLC; Cox Communications, Inc.; Mediacom Communications Corporation; RCN Telecom Services, LLC; Time Warner Cable; Time Warner Cable Enterprises LLC; WadeDivision Holdings, LLC; and WideOpen West Finance LLC (collectively, “Non-Party Cable Companies”) regarding non-parties Gregory Collins and Kamal Mian’s Motion to Intervene and Unseal Documents (D.I. 101, “Motion to Unseal Documents”) and objections to sealing portions of the Court’s October 5, 2022 Memorandum Opinion (D.I. 158, “Objections”).

Just yesterday, Non-Party Cable Companies learned that the total dollar figure in the underlying settlement agreement that gave rise to the present action was made public in a separate litigation involving ChanBond and/or its attorneys, even though the terms of the settlement agreement required that it be kept confidential. Neither ChanBond nor its attorneys previously informed Non-Party Cable Companies or their outside counsel that the dollar amount had been made public, nor did ChanBond or its attorneys seek Non-Party Cable Companies’ consent prior to such disclosure.¹ Accordingly, Non-Party Cable Companies were unaware of such disclosure before yesterday.

¹ ChanBond and its attorneys also did not inform Non-Party Cable Companies or their outside counsel of the Motion to Unseal Documents or the Objections.

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Notwithstanding the disclosures already made in the action involving ChanBond and/or its attorneys regarding the total dollar figure of the settlement agreement, Non-Party Cable Companies respectfully request that the underlying settlement agreement, as well as any other terms of that agreement, remain confidential and under seal. To the extent the Court is otherwise inclined, however, Non-Party Cable Companies respectfully request the opportunity to be heard on this issue.

Counsel is available should the Court have any questions.

Respectfully,

/s/ Jennifer Ying

Jennifer Ying (#5550)

JY/lo

cc: Clerk of the Court (via hand delivery)
All Counsel of Record (via CM/ECF and e-mail)
Krishnan Padmanabhan, Esq. (via e-mail)
David Enzminger, Esq. (via e-mail)